

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

VICTOR BROOKS,

Plaintiff,

v.

LISA MADIGAN (personally and in
her official capacity as Illinois
Attorney General); MARK ROSS
(personally and in his capacity as an
Illinois State Police Officer); JOSEPH
PONSETTO (personally and in his
official capacity as an Assistant Illinois
Attorney General); EDWARD C.
CARTER, III (personally and in his
official capacity as an Assistant
Attorney General); JORGE L.
MONTES (personally and in his
official capacity as a Member of the
Illinois Prisoner Review Board);
NORMAN M. SULA (personally and
in his official capacity as a Member of
the Illinois Prisoner Review Board;
KENNETH D. TUPY (personally and
in his official capacity as an employee
of the Illinois Prisoner Review Board);
and, other Unnamed and/or Unknown
Officers, Officials and Employees of
the State of Illinois,

Defendants.

) FILED: APRIL 28, 2008
)
) 08CV2417 J. N.
) JUDGE ZAGEL
) MAG. JUDGE DENLOW
)

) No. _____
)

) Formerly case No. 2008 L 2999
) Circuit Court of Cook County
)

NOTICE OF REMOVAL

NOW COMES Illinois Attorney General LISA MADIGAN, in her personal
and official capacities as Attorney General of the State of Illinois, MARK ROSS,
personally and in his capacity as an Illinois State Police Officer, JOSEPH
PONSETTO, personally and in his official capacity as an Assistant Illinois Attorney
General, EDWARD C. CARTER, III personally and in his official capacity as an

Assistant Attorney General, JORGE L. MONTES, personally and in his official capacity as a Member of the Illinois Prisoner Review Board, KENNETH D. TUPY, personally and in his official capacity as an employee of the Illinois Prisoner Review Board (“the Removing Parties”)¹, by their attorney, LISA MADIGAN, Attorney General of the State of Illinois, respectfully submit this notice of removal of the above-captioned suit pending in the Circuit Court of Cook County, Illinois, to the United States District Court, Northern District of Illinois, pursuant to 28 U.S.C. §1441(b) and (c) and §1446, and in support states the following:

1. On March 18, 2008, the Removing Parties were named as Defendants in a civil action in the Circuit Court of Cook County, case number 2008 L 2999, entitled *Victor Brooks v. Lisa Madigan, et al.*

2. On or about March 28, 2008, a summons and complaint were served upon Defendant Kenneth D. Tupy at his place of business at 319 E. Madison St, Suite A, Springfield, Illinois.² This Notice is filed within 30 days after such service.

3. Plaintiff brings this action pursuant to 42 U.S.C. § 1983. The complaint alleges, *inter alia*, that the Defendants made certain false statements and engaged in conduct that resulted in the Plaintiff being unlawfully arrested, indicted, charged, and

¹ Defendants who have been served and filed Appearances in the State case (*i.e.*, Lisa Madigan, Mark Ross, Joseph Ponsetto, Edward Carter III, Kenneth Tupy, and Jorge Montes) hereby consent to removal. *See Shaw v. Dow Brands, Inc.* 994 F.2d 364, 368 (7th Circuit 1993) (requiring consent of all Defendants for removal, or, in the absence of uniform consent, an explanation for lack of uniformity). As of the date of this filing, it is not known whether the remaining Defendant, NORMAN M. SULA, has been served.

² The remaining Defendants/Removing Parties (Lisa Madigan, Mark Ross, Joseph Ponsetto, Edward Carter III, and Jorge Montes) were either served on or after March 28, 2008. It is not known whether Defendant/Removing Party Norman Sula has been served.

prosecuted criminally in violation of his right to equal protection of the laws in violation of the United States Constitution and Title 42, U.S.C., Section 1983, and ostensibly his rights under Illinois law.

4. The Removing Parties are entitled to remove this action to this court, pursuant to 28 U.S.C. § 1441(b) and (c).

5. From the face of Plaintiff's complaint this is a civil rights action which arises under the United States Constitution and involves a federal question. Plaintiff's complaint alleges, among other things, that the Defendants violated the rights of the plaintiff as guaranteed by the United States Constitution.

6. The Removing Parties have attached all documents filed in the Circuit Court of Cook County in the State of Illinois case number 08 L 2999 (see attached documents hereto as Exhibit A).

WHEREFORE, the Removing Parties respectfully request that the above-entitled action now pending in the Circuit Court of Cook County in the State of Illinois, case number 08 L 2999, be removed therefrom to this Court

April 28, 2008

LISA MADIGAN
Attorney General of Illinois

Respectfully,

/s/ Ronald A. Rascia
RONALD A. RASCIA
KATHLEEN FORD
ALLEN ABINOJA
MARK W. BINA
Assistant Attorneys General
100 West Randolph Street
Chicago, Illinois 60601
(312) 814-3000

08CV2417 J. N.
JUDGE ZAGEL
MAG. JUDGE DENLOW

PLAINTIFF'S COMPLAINT

EXHIBIT #1

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - LAW DIVISION

Plaintiff,

2008L002999
CALENDAR/ROOM D
TIME 00:00
NO FI Stat Misc Action

JURY DEMAND

Defendants.

The Plaintiff, **VICTOR BROOKS** (hereinafter "Plaintiff"), by his attorney, A. BODDIE, Attorney at Law, and complaining of the Defendants, **LISA M. MADIGAN** (personally and in her Official capacity as Illinois Attorney General); **MARK ROSS** (personally and in his

capacity as an Illinois State Police Officer); **JOSEPH PONSETTO** (personally and in his capacity as an Assistant Illinois Attorney General); **EDWARD C. CARTER, III** (personally and in his Capacity as an Assistant Illinois Attorney General); **JORGE L. MONTES** (personally and in his capacity as a Member of the Illinois Prisoner Review Board); **NORMAN M. SULA** (personally and in his capacity as a Member of the Illinois Prisoner Review Board); **KENNETH D. TUPY** (personally and in his Capacity as an employee of the Illinois Prisoner Review Board); and, other Unnamed and/or Unknown Officers, Officials and Employees of State of Illinois,, alleges as follows:

This is a civil action seeking money damages against Defendants for committing acts, under color of law, which deprived Plaintiff of rights secured under the Constitutions and laws of the United States and the State of Illinois; for conspiring for the purpose of impeding and hindering the due course of justice, with the intent to deny Plaintiff equal protection of the laws; and for refusing or neglecting to prevent such deprivations and denials to Plaintiff pursuant to 42 U.S.C., Sections 1983 and 1988.

a. Parties.

1. Plaintiff is and was, at all times material herein, a citizen of the United States.
2. Plaintiff was, at all times material herein, a citizen and resident of the States of Illinois and Missouri.
3. Plaintiff is a resident of the City of Florissant, in the County

of St. Louis and State of Missouri.

4. Defendant, LISA M. MADIGAN, is and was, at all times material herein, a citizen of the United States, a resident of the State of Illinois and the duly elected Attorney General of the State of Illinois.

5. Defendant, MARK ROSS, is an Illinois State Police Officer and, was, at all times material herein, a citizen of the United States, and duly appointed and/or acting official, officer and/or employee of the State of Illinois.

6. Defendants, JOSEPH PONSETTO and EDWARD C. CARTER, III, are Assistant Illinois Attorneys General and, were, at all times material herein, citizens of the United States, and duly appointed and/or acting officials, officers and/or employees of the State of Illinois.

7. Defendants, JORGE L. MONTES and NORMAN M. SULA, are Members of the Illinois Prisoner Review Board and, were, at all times material herein, citizens of the United States, and duly appointed and/or acting officials, officers and/or employees of the State of Illinois.

8. Defendant, KENNETH D. TUPY, is Legal Counsel to the Illinois Prisoner Review Board and, was, at all times material herein, a citizen of the United States, and duly appointed and/or acting official, officer and/or employee of the State of Illinois.

9. Other Defendants, presently UNNAMED and UNKNOWN, are and, were, at all times material herein, citizens of the United States, and duly appointed and/or acting officials, officers and/or employees of the

State of Illinois.

10. Defendants, LISA M. MADIGAN, MARK ROSS, JOSEPH PONSETTO, EDWARD C. CARTER, III, JORGE L. MONTES, NORMAN M. SULA and KENNETH D. TUPY, and others presently UNNAMED and UNKNOWN, were, at all times material herein, acting under color of law, to wit: under the color of the statutes, regulations, policies, rules, customs and usages of the State of Illinois.

b. Facts.

11. On or before August 7, 1995, Plaintiff was nominated by then Illinois Governor Jim Edgar for appointment as a Member on the Illinois Prisoner Review Board, and duly appointed and commissioned a Member of the Illinois Prisoner Review Board.

12. On or before May 10, 2001, Plaintiff was re-nominated by then Illinois Governor George Ryan for re-appointment as a Member on the Illinois Prisoner Review Board, and duly re-pointed and re-commissioned a Member of the Illinois Prisoner Review Board.

13. On, before and about December 17, 2002, Plaintiff together with ten (10) other Members of the Illinois Prisoner Review Board participated in Illinois Prisoner Review Board proceedings regarding the pending parole hearing of Harry Aleman, and in so participating, Plaintiff provided the one vote in favor of parole for the said Harry Aleman.

14. On or after December 17, 2002, at least one but not all of, the Defendants initiated a criminal investigation against Plaintiff.

15. On or after December 17, 2002, at least one but not all of, the Defendants gave and/or provided and/or used false and/or misleading information during the criminal investigation of Plaintiff which played a significant role in the indictment, arrest and continued prosecution of Plaintiff.

16. On or after December 17, 2002, at least one but not all of, the Defendants gave and/or provided and/or used false and/or misleading information during the Grand Jury proceedings concerning Plaintiff which played a significant role in the indictment, arrest and continued prosecution of Plaintiff.

17. On or before April 30, 2004, Plaintiff was denied re-nomination as a Member of the Illinois Prisoner Review Board by then Illinois Governor Rod Blagojevich, and Plaintiff's tenure of eight (8) years and eight (8) months as a Member of the Illinois Prisoner Review Board was terminated.

18. On or about December 9, 2005, and as a direct result of, at least one but not all of, the Defendants' actions, Plaintiff was indicted by Grand Jury, and charged with committing the offenses of Official Misconduct and Wire Fraud in violation of Illinois Compiled Statutes, Chapter 720, Sections 5/33-3(b) and 5/17-24(a), under Bill of Indictment Number 5 CF 336, Counts V and VI, in the Circuit Court of the Fifteenth Judicial Circuit, Lee County, Illinois. A true and correct copy of said Bill of Indictment Number 5 CF 336, is attached hereto as "**PLAINTIFF'S EXHIBIT A**", and is incorporated herein by

reference.

19. On, about and after December 13, 2005, and as a direct result of, at least one but not all of, the Defendants' actions, Plaintiff was arrested and deprived of his freedom and liberty, and arraigned on the offenses of Official Misconduct and Wire Fraud in violation of Illinois Compiled Statutes, Chapter 720, Sections 5/33-3(b) and 5/17-24(a), under Case Number 05 CF 1671, Counts V and VI, in the Circuit Court of the Seventh Judicial Circuit, Sangamon County, Illinois.

20. On and between December 13, 2005 and March 19, 2007, and as a direct result of, at least one but not all of, the Defendants' actions, Plaintiff was deprived of his freedoms and liberty, and prosecuted on the offenses of Official Misconduct and Wire Fraud in violation of Illinois Compiled Statutes, Chapter 720, Sections 5/33-3(b) and 5/17-24(a), under Case Number 05 CF 1671, Counts V and VI, in the Circuit Court of the Seventh Judicial Circuit, Sangamon County, Illinois.

21. On or about March 19, 2007, Plaintiff was acquitted, found not guilty the offenses of Official Misconduct and Wire Fraud in violation of Illinois Compiled Statutes, Chapter 720, Sections 5/33-3(b) and 5/17-24(a), under Case Number 05 CF 1671, Counts V and VI, in the Circuit Court of the Seventh Judicial Circuit, Sangamon County, Illinois, following a Bench Trial.

22. Plaintiff's acquittal on or about March 19, 2007, of the

offenses of Official Misconduct and Wire Fraud in violation of Illinois Compiled Statutes, Chapter 720, Sections 5/33-3(b) and 5/17-24(a), under Case Number 05 CF 1671, Counts V and VI, in the Circuit Court of the Seventh Judicial Circuit, Sangamon County, Illinois, following a Bench Trial, was a final determination of said case as to Plaintiff.

23. As a direct and/or proximate result of Plaintiff being accused, investigated, indicted, arrested, confined and prosecuted by Defendants, Plaintiff suffered divers physical and emotional harms and injuries, to wit: nervousness, mental and physical anxiety, mental and physical distress, and mental and physical aches, hurts and pains.

24. As a result of their concerted unlawful and malicious physical and mental abuse of Plaintiff, Defendants intentionally, or with deliberate indifference and callous disregard of Plaintiff's rights, deprived Plaintiff of his right to equal protection of the laws and impeded the due course of justice, in violation of the Constitution of the United States, and Title 42, U.S.C., Section 1983.

25. As a result of their concerted unlawful and malicious physical and mental abuse of Plaintiff, Defendants intentionally, or with deliberate indifference and callous disregard of Plaintiff's rights, and totally without probable cause therefore, contrary to United States Law, Illinois law and Plaintiff's will, and intending thereby to cause Plaintiff to be imprisoned and deprived of liberty,

wrongfully and unlawfully caused Plaintiff to be charged, arrested, imprisoned, arraigned and prosecuted.

26. As a result of their concerted unlawful and malicious physical and mental abuse of Plaintiff, Defendants intentionally, or with deliberate indifference and callous disregard of Plaintiff's rights, did at said times and places willfully and wantonly and falsely accuse Plaintiff of violating said Illinois Compiled Statutes, Sections 720 ILCS 5/33-3(b) and 5/17-24(a); and then and there, in a willful and wanton manner, falsely charge, arrest, detain and prosecute Plaintiff, all against his will.

27. As a direct and proximate result of Defendants' said accusations, investigation, arrest, detention, imprisonment and prosecution of Plaintiff, Plaintiff was exposed to public disgrace and humiliation, caused to suffer great pains and anguish of body and spirit thereby, and further caused Plaintiff, in and about defending said charges and establishing Plaintiff's innocence thereof, expended or lost large sums of money in counsel and attorneys' fees and costs of litigation, and from necessary diversions of Plaintiff's time and attention from Plaintiff's ordinary and usual affairs of life, business and occupation.

28. As a direct and proximate result of the allegations contained in Paragraphs (1) through (23), above, Plaintiff has been, and will continue to be, caused to suffer great and substantial losses in income, incur or be obligated to incur large sums in attorney's fees,

and other costs of litigation.

FOR REASONS STATED HEREIN, Plaintiff, **VICTOR BROOKS**, requests judgment against Defendants, jointly and severally, and in favor of Plaintiff for sums in excess \$1,000,000.00 compensatory damages; \$3,000,000.00 punitive damages; plus, Plaintiff's attorney's fees and all other costs of litigation incurred in bringing and completed this action.

Respectfully submitted,

BY: _____
ARVIN BODDIE, Attorney for
Plaintiff, **VICTOR BROOKS**

Atty. No. 18216
A. BODDIE, Attorney at Law
P.O. Box 288910
Chicago, Illinois 60628-8910
(773) 928-9551

Feb-23-08 05:12pm From-ILL Attorney General's Office

312 814 5366

T-222 P.002/008 F-835

FILE

FILED
DEC 09 2005
BY Lee County Circuit ClerkIN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
LEE COUNTY, ILLINOIS

PEOPLE OF THE STATE OF ILLINOIS,)

Plaintiff)

v.)

RONALD MATRISCIANO and)
VICTOR BROOKS,)

Defendants)

5 CF. 336.

Amendment only affects
(ts I thru IV)

BILL OF INDICTMENT

COUNT I

The Grand Jurors chosen, selected, and sworn, in and for the County of Lee, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about December 17, 2002 at and within Lee County,

RONALD MATRISCIANO

committed the offense of **OFFICIAL MISCONDUCT**

in that while acting in his official capacity as an employee of the Illinois Department of Corrections and with the intent to gain a personal advantage for another, to wit: Harry Aleman, a committed person in the custody of the Illinois Department of Corrections, he performed an act in excess of his authority, to wit: while acting in his official capacity he provided a statement to the Illinois Prisoner Review Board which purported to be a recommendation of the Illinois Department of Corrections to parole Harry Aleman, when he knew that if he provided a statement recommending the parole of Harry Aleman he was to do so personally, in violation of Illinois Compiled Statutes, Chapter 720, Section 5/33(c) and against the peace and dignity of the same People of the State of Illinois

Class 3 Felony

→ should be 5/33-3(c)

PLAINTIFF'S

EXHIBIT

A

Feb-23-06 05:12pm From: ILL Attorney General's Office

312 814 5366

T-222 P.003/008 F-835

COUNT II

The Grand Jurors chosen, selected, and sworn, in and for the County of Lee, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about December 17, 2002 at and within Lee County,

RONALD MATRISCIANO

committed the offense of **OFFICIAL MISCONDUCT**

in that while acting in his official capacity as an employee of the Illinois Department of Corrections and with the intent to gain a personal advantage for another, to wit: Harry Aleman, a committed person in the custody of the Illinois Department of Corrections, he performed an act in excess of his authority, to wit: while acting in his official capacity he made a statement to the Illinois Prisoner Review Board which purported to be a statement of the Illinois Department of Corrections recommending the parole of Harry Aleman when he knew that if he made a statement recommending the parole of Harry Aleman he was to do so personally, in violation of Illinois Compiled Statutes, Chapter 720, Section 5/33(c) and against the peace and dignity of the same People of the State of Illinois

Class 3 Felony

→ should be 5/33-3(c)

Feb-23-06 05:12pm From-ILL Attorney General's Office

912 814 5368

T-222 P.004/008 F-895

COUNT III

The Grand Jurors chosen, selected, and sworn, in and for the County of Lee, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about December 17, 2002 at and within Lee County,

RONALD MATRISCIANO

committed the offense of **OFFICIAL MISCONDUCT**

in that while acting in his official capacity as an employee of the Illinois Department of Corrections, he knowingly performed an act which he knew he was forbidden by law to perform, to wit: in violation of Illinois Administrative Code, Chapter 20, Section 20.30 he engaged in conduct which impaired the operations of the Illinois Department of Corrections in that in his official capacity and in excess of his authority he provided a statement to the Illinois Prisoner Review Board which purported to be a recommendation of the Illinois Department of Corrections to parole Harry Aleman, a committed person in the custody of the Illinois Department of Corrections, when he knew that if he provided such a statement he was to do so personally, in violation of Illinois Compiled Statutes, Chapter 720, Section 5/33(b), and against the peace and dignity of the same People of the State of Illinois.

Class 3 Felony

→ should be 5/33-3(b)

Feb-23-08 05:13pm From-ILL Attorney General's Office

312 814 5366

T-222 P.005/008 F-835

COUNT IV

The Grand Jurors chosen, selected, and sworn, in and for the County of Lee, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths present that on or about December 17, 2002 at and within Lee County,

RONALD MATRISCIANO

committed the offense of **OFFICIAL MISCONDUCT**

in that while acting in his official capacity as an employee of the Illinois Department of Corrections, he knowingly performed an act which he knew he was forbidden by law to perform, to wit: in violation of Illinois Administrative Code, Chapter 20, Section 120.30 he engaged in conduct which impaired the operations of the Illinois Department of Corrections in that in his official capacity and in excess of his authority he made a statement to the Illinois Prisoner Review Board which purported to be a recommendation of the Illinois Department of Corrections to parole of Harry Aleman, a committed person in the custody of the Illinois Department of Corrections, when he knew that if he provided such a statement he was to do so personally, in violation of Illinois Compiled Statutes, Chapter 720, Section 5/33(b) and against the peace and dignity of the same People of the State of Illinois.

Class 3 Felony

→ should be 5/33-3(b)

Feb-23-06 05:13pm From-ILL Attorney General's Office

312 814 5366

T-222 P.006/008 F-835

COUNT V

The Grand Jurors chosen, selected and sworn, in and for the County of Lee, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths, aforesaid present that on or about December 17, 2002 at and within the County of Sangamon,

VICTOR BROOKS

committed the offense of **OFFICIAL MISCONDUCT**

in that while acting in his official capacity as a public officer, to wit: as a member of the Illinois Prisoner Review Board, he knowingly performed an act which he knew he was forbidden by law to perform, to wit: in connection with an agreement with Ronald Matrisciano under which in return for Ronald Matrisciano's assistance in obtaining employment in Las Vegas for Victor Brooks' son, Nicolas Brooks, Victor Brooks would vote to parole Harry Aleman, a committed person in the custody of the Illinois Department of Corrections, Victor Brooks voted to parole Harry Aleman, in violation of Illinois Compiled Statutes, Chapter 720, Chapter 5/33-3(b), and against the peace and dignity of the same People of the State of Illinois.

Class 3 Felony

Feb-23-06 05:13pm From-ILL Attorney General's Office

312 814 5386

T-222 P.007/008 F-835

COUNT VI

The Grand Jurors chosen, selected and sworn, in and for the County of Lee, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths, aforesaid present that between or about January 1, 2002 and December 31, 2002 at and within the County of Will,

RONALD MATRISCIANO and VICTOR BROOKS

committed the offense of

WIRE FRAUD

in that in connection with a parole hearing for Harry Aleman, a committed person in the custody of the Illinois Department of Corrections Ronald Matrisciano devised a scheme to defraud the public of the intangible right to the honest services of Victor Brooks and for the purpose of executing the said scheme he caused a writing to be transmitted by fax from within Will County, Illinois to the Illinois Prisoner Review Board; that Victor Brooks aided and abetted Ronald Matrisciano in the said scheme in that he accepted an advantage to which he was not entitled in return for agreeing to vote to parole Harry Aleman and that in return for the said advantage and in furtherance of the scheme Victor Brooks voted to parole Harry Aleman; and that the last act in furtherance of the scheme was committed after December 16, 2002 when some time after December 16, 2002 Victor Brooks voted to parole Harry Aleman, in violation of Illinois Compiled Statutes, Chapter 720, Section 5/17-24(a), and against the peace and dignity of the same People of the State of Illinois.

Class 3 Felony

Feb-23-06 05:13pm From-ILL Attorney General's Office

312 814 5366

T-222 P.008/008 F-835

COUNT VII

The Grand Jurors chosen, selected and sworn, in and for the County of Lee, in the State of Illinois, in the name and by the authority of the People of the State of Illinois, upon their oaths, aforesaid present that between or about January 1, 2002 and December 31, 2002 at and within the County of Will,

RONALD MATRISCIANO

committed the offense of

WIRE FRAUD

in that Ronald Matrisciano devised a scheme to defraud the Illinois Prisoner Review Board of its right to truthful information in connection with parole decisions and for the purpose of executing the said scheme he caused a writing to be transmitted by fax from within Will County, Illinois to the Illinois Prisoner Review Board which purported to contain a recommendation of the Illinois Department of Corrections to parole Harry Aleman, a committed person in the custody of the Illinois Department of Corrections, that Ronald Matrisciano knew that the Illinois Department of Corrections was not recommending the parole of Harry Aleman and that he further knew that if he was to make a recommendation to parole Harry Aleman he was to do so in his personal capacity, and that the last act in furtherance of the scheme was committed on or about December 17, 2002 when Ronald Matrisciano, purporting to be appearing in his official capacity appeared before the Illinois Prisoner Review Board and made a statement in support of paroling the said Harry Aleman, in violation of Illinois Compiled Statutes, Chapter 720, Section 5/17-24(a), and against the peace and dignity of the same People of the State of Illinois.

Class 3 Felony

A True Bill



Foreperson of the Grand Jury

Witness:

Mark Ross,
Illinois State Police
400 Iles Park Pl Ste. 140
Springfield, IL 62703
217-557-2947

08CV2417 J. N.
JUDGE ZAGEL
MAG. JUDGE DENLOW

DEFENDANTS' SUMMONS

EXHIBIT #2

2120 - Served
 2220 - Not Served
 2320 - Served By Mail
 2420 - Served By Publication
 SUMMONS

2121 - Served
 2221 - Not Served
 2321 - Served By Mail
 2421 - Served By Publication
 ALIAS - SUMMONS

CCG N001-7

RECEIVED

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, LAW

MAR 31 2008
 DIVISION Illinois State Police
 LEGAL OFFICE

(Name all parties)

Victor Brooks, Plaintiff,

v.

Lisa M. Madigan, et al., Defendants.

2008L002999
 CALENDAR/ROOM D
 TIME 00:00
 PI Stat Misc Action
 No. _____

SUMMONS

To each Defendant: Mark Ross, State Police Officer

Service Address:
Illinois State Police
801 S. Seventh St.
Suite 103
Springfield, IL 62794

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

☒ Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602

☐ District 2 - Skokie
 5600 Old Orchard Rd.
 Skokie, IL 60077

☐ District 3 - Rolling Meadows
 2121 Euclid
 Rolling Meadows, IL 60008

☐ District 4 - Maywood
 1500 Maybrook Ave.
 Maywood, IL 60153

☐ District 5 - Bridgeview
 10220 S. 76th Ave.
 Bridgeview, IL 60455

☐ District 6 - Markham
 16501 S. Kedzie Pkwy.
 Markham, IL 60426

☐ Child Support
 28 North Clark St., Room 200
 Chicago, Illinois 60602

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

Atty. No.: 18216Name: A. BoddieAtty. for: PlaintiffAddress: P.O. Box 288910City/State/Zip: Chicago, IL 60628-8910Telephone: (773) 928-9551

Service by Facsimile Transmission will be accepted at: _____

WITNESS, _____

MAR 18 2008

DOROTHY BROWN
 Clerk of Court

Date of service: _____

(To be inserted by officer on copy left with defendant
 or other person)

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ORIGINAL - COURT FILE

2120 - Served
2220 - Not Served
2320 - Served By Mail
2420 - Served By Publication
SUMMONS

2121 - Served
2221 - Not Served
2321 - Served By Mail
2421 - Served By Publication
ALLAS - SUMMONS

COG 0001-75M-1220/05 (42486658)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

(Name all parties)

Victor Brooks, Plaintiff,

v.

Lisa M. Madigan, et al., Defendants.

2008L002999
CALENDAR/ROOM D
TIME 00:00
No. PI Stat Misc Action

Service Address:
Office of Ill. Atty. Gen.
State of Illinois Center
100 W. Randolph St., 12th Fl.
Chicago, IL 60601

SUMMONS

To each Defendant: Joseph Ponsetto, Asst. Atty. Gen.

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

☒ Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602

☐ District 2 - Skokie
5600 Old Orchard Rd.
Skokie, IL 60077

☐ District 3 - Rolling Meadows
2121 Euclid
Rolling Meadows, IL 60008

☐ District 4 - Maywood
1500 Maybrook Ave.
Maywood, IL 60153

☐ District 5 - Bridgeview
10220 S. 76th Ave.
Bridgeview, IL 60455

☐ District 6 - Markham
16501 S. Kedzie Pkwy.
Markham, IL 60426

☐ Child Support
28 North Clark St., Room 200
Chicago, Illinois 60602

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

MAR 18 2008

Atty. No.: 18216

Name: A. Boddie

Atty. for: Plaintiff

Address: P.O. Box 288910

City/State/Zip: Chicago, IL 60628-8910

Telephone: (773) 928-9551

Service by Facsimile Transmission will be accepted at:

WITNESS, _____

DOROTHY BROWN
CLERK OF CIRCUIT COURT

Clerk of Court

Date of service: _____
(To be inserted by officer on copy left with Defendant or other person)

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ORIGINAL - COURT FILE

2120 - Served
2121 - Not Served
2320 - Served By Mail
2420 - Served By Publication
SUBPOENAS

2121 - Served
2122 - Not Served
2321 - Served By Mail
2421 - Served By Publication
ALIAS - SUBPOENAS

COG 0001-75M-2/28/03 (43490558)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

(Name all parties)

Victor Brooks, Plaintiff,

v.

Lisa M. Madigan, et al., Defendants.

2008L002999
CALENDAR/ROOM D
TIME 00:00
PI Stat Misc Action

No. _____

SUMMONS

To each Defendant: Edward C. Carter, III, Asst. Atty. Gen.

Service Address:
Office of Ill. Atty. Gen.
State of Illinois Center
100 W. Randolph St., 12th Fl.
Chicago, IL 60601

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

- ☒ Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602
- | | | |
|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> District 2 - Skokie
5600 Old Orchard Rd.
Skokie, IL 60077 | <input type="checkbox"/> District 3 - Rolling Meadows
2121 Euclid
Rolling Meadows, IL 60008 | <input type="checkbox"/> District 4 - Maywood
1500 Maybrook Ave.
Maywood, IL 60153 |
| <input type="checkbox"/> District 5 - Bridgeview
10220 S. 76th Ave.
Bridgeview, IL 60455 | <input type="checkbox"/> District 6 - Markham
16501 S. Kedzie Pkwy.
Markham, IL 60426 | <input type="checkbox"/> Child Support
28 North Clark St., Room 200
Chicago, Illinois 60602 |

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

Atty. No.: 18216
Name: A. Boddie
Atty. for: Plaintiff
Address: P.O. Box 288910
City/State/Zip: Chicago, IL 60628-8910
Telephone: (773) 928-9551

Service by Facsimile Transmission will be accepted at: _____

WITNESS, _____

MAR 18 2008

DOROTHY BROWN
CLERK OF COURT
Clerk of Court

Date of service: _____
(To be inserted by officer, copy left with defendant or other person)

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ORIGINAL - COURT FILE

2120 - Served
 2220 - Not Served
 2320 - Served By Mail
 2420 - Served By Publication
 SUMMONS

2121 - Served
 2221 - Not Served
 2321 - Served By Mail
 2421 - Served By Publication
 ALIAS - SUMMONS

CCG N001-75M-2/28/05 (43480658)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, LAW DIVISION

(Name all parties)

Victor Brooks, Plaintiff,

v.

Lisa M. Madigan, et al., Defendants.

SUMMONS

To each Defendant: Jorge L. Montes, Member

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

☒ Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602

☐ District 2 - Skokie
 5600 Old Orchard Rd.
 Skokie, IL 60077

☐ District 3 - Rolling Meadows
 2121 Euclid
 Rolling Meadows, IL 60008

☐ District 4 - Maywood
 1500 Maybrook Ave.
 Maywood, IL 60153

☐ District 5 - Bridgeview
 10220 S. 76th Ave.
 Bridgeview, IL 60455

☐ District 6 - Markham
 16501 S. Kedzie Pkwy.
 Markham, IL 60426

☐ Child Support
 28 North Clark St., Room 200
 Chicago, Illinois 60602

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MAR 18 2008

Atty. No.: 18216Name: A. BoddieAtty. for: PlaintiffAddress: P.O. Box 288910City/State/Zip: Chicago, IL 60628-8910Telephone: (773) 928-9551

Service by Facsimile Transmission will be accepted at:

WITNESS, _____

DOROTHY BROWN
CLERK OF CIRCUIT COURT

Clerk of Court

Date of service: _____

(To be inserted by officer on copy left with defendant or other person)

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ORIGINAL - COURT FILE

RECEIVED

20081002999

CALENDAR ROOM D

PRIME 00:00

PRISONER Misc Action

No. BOARD

Service Address:
 Prisoner Review Board
 319 E. Madison St.
 Suite A
 Springfield, IL 62701

2120 - Served
 2220 - Not Served
 2320 - Served By Mail
 2420 - Served By Publication
 SUMMONS

2121 - Served
 2221 - Not Served
 2321 - Served By Mail
 2421 - Served By Publication
 ALIAS - SUMMONS

CCG N001-75M-2/28/05 (43480658)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, LAW DIVISION

(Name all parties)

Victor Brooks, Plaintiff,

v.

Lisa M. Madigan, et al., Defendants.

2008L002999
 CALENDAR/ROOM D
 TIME 00:00
 PI Stat Misc Action

No. _____

SUMMONS

To each Defendant: Lisa M. Madigan, Atty. Gen.

Service Address:
 Office of Ill. Atty. Gen.
 State of Illinois Center
 100 W. Randolph St., 12th Fl.
 Chicago, IL 60601

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MAR 18 2008

Atty. No.: 18216Name: A. BoddieAtty. for: PlaintiffAddress: P.O. Box 288910City/State/Zip: Chicago, IL 60628-8910Telephone: (773) 928-9551

Service by Facsimile Transmission will be accepted at: _____

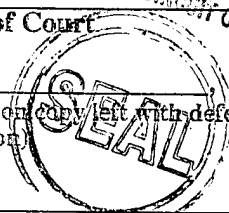
WITNESS, _____

DOROTHY BROWN
 CLERK OF CIRCUIT COURT

Clerk of Court

Date of service: _____

(To be inserted by officer on copy left with defendant or other person)



(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

ORIGINAL - COURT FILE